

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOANNE ANGEL,

Plaintiff,

v.

WELTMAN, WEINBERG & REIS
CO., LPA

Defendant.

No. 2:10-CV-01359-RSL

Fed.R.Civ.P. 26(f) Report

JOINT STATUS REPORT

Pursuant to this court's minute order dated October 21, 2010, Plaintiff and Defendant submit this Joint Status Report and Discovery Plan for the Court's consideration:

- Statement of the Nature and Complexity of Case:** This is a case concerning whether the Defendants violated the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* ("FDCPA"). Defendant denies these claims, and asserts defenses. The parties agree the case is not complex.

Joint Status Report

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- 1 2. **Proposed ADR Method:** The parties believe that a judicial settlement conference is the
2 best ADR methods for this case.
- 3 3. **Deadline for ADR Time:** The parties agree that the ADR proceeding should be held within
4 4 months after this Report is filed.
- 5 4. **Proposed Deadline for Amending the Pleadings and Joining Additional Parties:** Parties
6 agree the deadline for amending the pleadings and joining additional parties should be
7 February 1, 2011.
- 8 5. **Proposed Discovery Plan:**
 - 9 a. **The FRCP26(f) Conference and FRCP 26(a) initial disclosures:** The parties
10 conferred via telephone on October 25, 2010. Plaintiff exchanged her Initial Disclosure
11 on October 7, 2010. Defendant shall exchange its Initial Disclosure on or before
12 December 17, 2010.
 - 13 b. **Subject of Discovery; Process:** Discovery will be necessary as to the allegations in
14 plaintiff's complaint as well as the substantive defenses raised by Defendant. The
15 parties anticipate depositions of the parties and depositions, as necessary, of third party
16 witnesses.
 - 17 c. **Discovery Limitations:** The parties believe the standard rules of discovery should
18 apply to this case.
 - 19 d. **Discovery Management:**
 - 20 i. Written Discovery. The parties intend to serve Requests for Admission,
21 Interrogatories and Requests for Production.

1 ii. **Depositions.** Plaintiff anticipates taking depositions of the Defendant's company
2 representative(s) most knowledgeable about (1) Defendant's policies and procedures,
3 (2) Plaintiff's account and (3) Defendant's pleadings pursuant to FRCP 30(b)(6).
4 Plaintiff reserves the right to take additional depositions as discovery may reveal are
5 necessary. Depositions of persons outside the local jurisdiction may be taken by
6 telephone to reduce costs

7
8 Defendant anticipates taking the depositions of Plaintiff and any third parties that may
9 have knowledge regarding alleged liability or damages.

10 e. **Other Orders:** The parties do not anticipate any additional orders at this time.

11
12 6. **Discovery Completion:** The parties believe that discovery for all aspects of the case can be
13 completed by April 1, 2011.

14 7. **Magistrate:** The parties consent to a Magistrate Judge for the settlement conference but not
15 for the trial.

16 8. **Bifurcation:** The parties do not believe bifurcation is necessary.

17
18 9. **Pretrial Order:** The parties are not willing to waive pretrial statements and a pretrial order.

19 10. **Other Simplification of the Case:** None.

20 11. **Trial Readiness:** The parties believe that they will be ready for trial by June 1, 2011.

21 12. **Jury/Non-Jury Trial:** Plaintiff has requested a jury trial.

22 13. **Length of Trial:** The parties estimate a three day trial.

23 14. **Names, Addresses and Telephone Numbers of Counsel:** See below.

24 15. **Service Status:** Defendant has been served.

25 16. **Scheduling Conference:** The parties do not request a scheduling conference.

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Respectfully submitted this ____ day of December, 2010.

Dated: December 2, 2010

Dated: December 2, 2010

COUNSEL FOR PLAINTIFF

COUNSEL FOR DEFENDANT

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United States District Court CM/ECF system

s/Kimberly Larson

Kimberly Larson

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